

EXHIBIT 8

Google Analytics and Google Analytics for Firebase on Alphabet Properties Policy

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go/igapolicy.

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Purpose / Audience

The Google Analytics and Google Analytics for Firebase on Alphabet Properties Policy sets out the minimum privacy standards and requirements for teams using Google Analytics or Google Analytics for Firebase on [Alphabet properties](#). These requirements go beyond those for external Google Analytics customers for several reasons, including Google's position as both controller and processor.

For the use of Google Analytics on Apps products available under the GSuite agreement/ToS, refer to [the Apps / GfW / dasher policy](#).

This policy applies to all full-time and part-time employees, [extended workforce](#), and other authorized representatives of Alphabet and its subsidiaries.

Definitions

Alphabet Property

A Google or Alphabet product, site, or service (including websites, client products, and mobile apps). Alphabet properties can be both [Internal-facing](#) and [External-facing](#).

External-facing Alphabet Property

An Alphabet property that has users external to Alphabet (including advertisers, publishers, customers, and end-users).

Internal-facing Alphabet property

An Alphabet property that does not have customers or users external to Alphabet.

First-Party (1P)

Any stakeholder or product that is part of Google or Alphabet.

Third-Party (3P)

Any entity external to Alphabet.

cid

Google Analytics Client ID. See this [help-center article](#).

GA "Sensitive Features"

Google Analytics functionalities that require [PWG](#) review prior to use:

- User ID Override (concern: potential to collect PII (User ID))
- Session Unification (concern: joining signed-out and signed-in data, since other Google products may link signed-in data to PII)
- Remarketing (concern: potential to leak/link PII into Google Ads data)

Principles

There are five principles that guide the requirements in this policy.


Principle	Description
Conformance	Proper oversight is required when using Google Analytics across Google and Alphabet properties.
Collection	PII must not be collected by Google Analytics. If PII is accidentally tracked by Google Analytics, you must scrub it out of GA's data repository.
Deletion & Retention	The use of Google Analytics must adhere to the Google Analytics Standard Retention Plan , which specifies that non-aggregated Google Analytics data cannot be retained longer than 14 months.
1P Data Sharing	Google Analytics first-party data may not be shared outside of your respective Alphabet company. Any export of GA data between Alphabet companies must be reviewed with PWG Analytics prior to sharing.
3P Tools	Do not use analytics tools other than Google Analytics and Google Analytics for Firebase without privacy and security review (for example, SPUR).


Requirements

Principle: Conformance

 **The use of Google Analytics on external-facing Alphabet properties must be reviewed by the PWG associated with your product or service.**

All requests should be submitted through the PWG Analytics review form [go/o&o-review](#). A review must be requested when enabling Google Analytics for the first time and when data collection changes if Google Analytics is already used, or when enabling GA Sensitive Features.

 **GA integrations are not allowed on Alphabet properties, products, and services without explicit approval from PWG Analytics.**

 **Bets operating under their own privacy policy, rather than the Google Privacy Policy, cannot implement Google Analytics until the respective Bet legal counsel has reviewed and approved that the implementation of Google Analytics is consistent with the Bet's privacy disclosures, including its own cookie notices.**

According to the [Google Analytics Terms of Service](#), such privacy disclosures require the following:

"You must post a Privacy Policy, and that Privacy Policy must provide notice of your use of cookies that are used to collect data. You must disclose the use of Google Analytics, and how it collects and processes data. This can be done by displaying a prominent link to the site "How Google uses data when you use our partners' sites or apps", [www.google.com/policies/privacy/partners/](#), or any other URL Google may provide from time to time). You will use commercially reasonable efforts to ensure that a Visitor is provided with clear and comprehensive information about, and consents to storing and accessing of cookies or other information on the Visitor's device where such activity occurs in connection with the Service and where providing such information and obtaining such consent is required by law."

For more information on cookie consent, please see [Helping Publishers and Advertisers with Consent](#).

Principle: Data Collection

 **An Alphabet property must not collect PII or identifiers that can be joined to PII in Google Analytics.**

Use [Best practices to avoid sending Personally Identifiable Information \(PII\)](#).

There are several common use cases where data may be overlooked as PII, as defined in the [Data Classification Guidelines](#) (listed in [section 1, subsection "Where do PII leaks often happen while using GA?"](#):

- Permanent identifiers or any other identifiers that cannot be reset (for example, MAC address, IMEI, IP address)
- If you plan to use custom dimensions, refer to [Data Classification Guidelines](#) to ensure no PII is collected
- Hashed or encrypted PII - This is considered PII on Google or Alphabet properties
- Page URL - The most common way in which inadvertent PII is captured

- Referrer URL - May not be our URL, but still our responsibility
- Search query - There is almost always some user who searches for his/her email address
- Custom dimensions or variables
- Ecommerce data - Transaction ID, order IDs might be transitive PII's
- Parameters referrer from the referrer URL

✦ If PII is accidentally tracked by Google Analytics, you must report the details to [PII injection reporting form](#) so this data can be scrubbed out of GA's data repository. (This process is managed by [analytics-data-deletion-requests@](#), not by [pwg-analytics@](#)).

✦ An Alphabet property must not send either [explicit location or indirect user position](#) information (except as included in default analytics collection) into an Analytics property.

✦ An Alphabet property must ensure Google Analytics cookies are not logged by the product (separately from Google Analytics).

✦ Do not collect cid (or application instance id) to non-GA storage such as Sawmill and/or Clearcut.

Principle: Deletion & Retention

✦ Alphabet properties should not retain [non-aggregated](#) Google Analytics data longer than the default 14 months without explicit approval from pwg-retention.

✦ An Alphabet property that uses Google Analytics must [reference the GA standard retention plan](#) in the PDD.

Principle: First-Party Sharing (i.e., data export of GA data to a different Google or Alphabet platform)

✦ Do not share first-party data outside of your Bet.

Due to the resulting exposure of the data owner, Google Analytics first-party data may not be shared outside of your respective Alphabet company. For example, it would be prohibited to upload exported Google Analytics data to a marketing orchestration platform outside of your Alphabet company.

✦ Enabling GA's ability to export from GA to a Google platform (e.g., Integrated Google Cloud Services (BigQuery)) must be reviewed in advance by [pwg-analytics@](#). See [go/o&o-review](#) for more information.

✦ Any downstream use of GA data export, like combining GA data with other data sources using cid-keyed data, timestamps, or location in a deterministic or probabilistic fashion, must be reviewed in advance by [pwg-analytics@](#).

Even probabilistic joins are problematic depending on the accuracy of the join and the fidelity of the associated data on either side of the join. They may start to look deterministic; therefore, we do not allow for joins without explicit review.

Principle: Third-Party Sharing

✦ Use of third-party analytics services and tools on Google or Other Bet properties must be approved by [pwg-analytics@](#) in addition to third-party security reviews.

Exceptions

Exceptions to this policy must be approved by the Director of Privacy or delegate.

References

Related Documents:

- Prior to using Google Analytics, review the following resources to understand usage requirements, policies, and limitations.
 - [GA-1P Principles & Processes Training](#) ([go/ga-o&o-principles-training](#))
 - [go/pwg-iga](#)
 - Setting up an internal Google Analytics Account ([go/iga](#))

- Setting up a continuous monitoring of collecting Google Analytics data (see [Appendix 1](#) to Black Export Report)
- Links to [other relevant documentation, slides, docs](#)
- For Google Tag Manager (GTM) on Alphabet properties, please refer to these [guidelines](#).

Questions / Feedback

If you have a question about the guidance in this document or its applicability, start with the relevant [Privacy Working Group](#) or Product Counsel ([go/whichlawyer](#)).

If you have feedback on this document, send an email to ipp-questions@google.com.

Roles and Responsibilities

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